

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA)
)
)
)
v.)
)
)
RICHARD W. GATES III,)
)
)
Defendant.)
)
Crim. No. 17-201-2 (ABJ)
FILED UNDER SEAL

**DEFENDANT RICHARD W. GATES III'S UNOPPOSED MOTION FOR LEAVE
TO FILE UNDER SEAL HIS MOTION TO MODIFY CONDITIONS OF
RELEASE**

Richard W. Gates III, by and through counsel, hereby moves this Court for leave to file under seal his Unopposed Motion to Modify Conditions of Release. Despite the general policy that public access to judicial proceedings and judicial records is important to the proper functioning of our justice system, there are compelling reasons and good cause in this instance why the Motion should not be publicly disclosed. The Motion includes details about Mr. Gates's continuing cooperation. It also contains specific details about Mr. Gates's and his family's travel and locations. The Court has noted on more than one occasion that this case is subject to substantial publicity and media coverage. The proposed disclosure will sufficiently alert the public that Mr. Gates has permission to engage in travel, without providing unnecessary details regarding his cooperation or details about his family.

WHEREFORE, Mr. Gates hereby respectfully moves this Court for leave to file under seal his Unopposed Motion to Modify Conditions of Release. A draft order is attached.

Respectfully submitted,

/s/Thomas C. Green

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